

Hon. H. Russel Holland

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Aetna Life Insurance Co. and  
Alaska Railroad Corp. Group Plan

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

ALLEN REYNOLDS,	)	
	)	
Plaintiff,	)	Case No.: 3:12-CV-00078-HRH
	)	
v.	)	UNOPPOSED MOTION TO STAY
	)	
AETNA LIFE INSURANCE CO.; and,	)	
ALASKA RAILROAD CORP.; and, ALASKA	)	
RAILROAD CORP. GROUP PLAN,	)	
	)	
Defendants.	)	
_____	)	

**UNOPPOSED MOTION TO STAY**

Pursuant to the parties' agreement, counsel for Plaintiff and counsel for Defendants jointly request this matter be stayed to allow the benefit claims at issue in this case to be reviewed by the administrator under the medical plan at issue here. This motion is for good cause and not for the purpose of delay. By agreeing to this stay, no party waives any claims, defenses, or objections to the jurisdiction of this Court.

UNOPPOSED MOTION TO STAY - 1

#848229 v1 / 44767-003  
Case 3:12-cv-00078-HRH

*Law Offices*  
**KARR TUTTLE CAMPBELL**  
*A Professional Service Corporation*

1  
2 Dated this 25<sup>th</sup> day of May, 2012.

3 Respectfully submitted by:

4  
5 s/ Paul H. Bratton (Consent)

6 Paul Bratton

7 **LAW OFFICE OF PAUL H. BRATTON**

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13 *Attorneys for Plaintiff Allen Reynolds*

14  
15 Dated this 25<sup>th</sup> day of May, 2012.

16 Respectfully submitted by:

17 s/ Medora A. Marisseau

18 Medora A. Marisseau, WSBA #23114

19 **KARR TUTTLE CAMPBELL**

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25 *Attorneys for Defendants Aetna Life*

26 *Insurance Co. and Alaska Railroad Corp.*

27 *Group Plan*

1  
2 Dated this 25<sup>th</sup> day of May, 2012.

3 Respectfully submitted by:

4  
5 s/ James E. Torgerson (Consent)

6 James E. Torgerson  
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14 *Attorneys for Alaska Railroad Corporation*  
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2 **[PROPOSED] ORDER**

3 It is hereby ORDERED and ADJUDGED, that pursuant to the parties' unopposed  
4 motion, this matter shall be stayed for a period of 180 days.  
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6  
7 Dated: \_\_\_\_\_, 2012.  
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9 \_\_\_\_\_  
10 Hon. H. Russel Holland  
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**CERTIFICATE OF SERVICE**

I, Medora A. Marisseau, affirm and state that I am employed by Karr Tuttle Campbell in King County, in the State of Washington. I am over the age of 18 and not a party to the within action. My business address is: 1201 Third Ave., Suite 2900, Seattle, WA 98101. On this day, I caused to be filed with United States District Court for the District of Alaska a true and correct copy of the Unopposed Motion to Stay by using the Court's electronic filing system. I caused the same to be served on the parties listed below in the manner indicated:

Paul H. Bratton  
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*Attorneys for Plaintiff*

- ☐ Via U.S. Mail
- ☐ Via Hand Delivery
- ☐ Via Electronic Mail
- ☐ Via Overnight Mail
- ☒ CM/ECF via court's website

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*Attorneys for Defendant Alaska Railroad Corporation*

- ☐ Via U.S. Mail
- ☐ Via Hand Delivery
- ☐ Via Electronic Mail
- ☐ Via Overnight Mail
- ☒ CM/ECF via court's website

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, to the best of my knowledge. Executed on May 25, 2012, at Seattle, Washington.

s/ Medora A. Marisseau  
Medora A. Marisseau